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FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

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8 UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF WASHINGTON

2:15-CR-8-WFN
INDICTMENT

10
11 UNITED STATES OF AMERICA, }
12 Plaintiff,

13 vs.

14
15 ANTHONY DANIEL RAMIL,
16 GERALD W. TARMAN,
17 TERESA LOUISE ALLEN
(AKA-TERESA GARCIA), and
18 BRIENNA ELAINE ALLEN,
19 Defendants.

Vio: 18 U.S.C. § 371
Conspiracy to
Manufacture and Pass
Counterfeit Currency
(Count 1)
Vio: 18 U.S.C. § 472
Passing Counterfeit
Currency
(Counts 2-5)
Vio: 18 U.S.C. § 471
Manufacture of
Counterfeit Currency
(Count 6)
Notice of Criminal
Forfeiture Allegations

20
21 The Grand Jury charges that:

22
COUNT 1

23
24 That beginning an exact date unknown, but no later than or about May 21, 2013,
25 and continuing until on or about July 12, 2013, in the Eastern District of Washington, the
26 Defendants, ANTHONY DANIEL RAMIL, GERALD W. TARMAN, TERESA
27 LOUISE ALLEN, and BRIENNA ELAINE ALLEN, and others both known and
28 unknown to the Grand Jury, did unlawfully and knowingly combine, conspire,

INDICTMENT - 1

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1 confederate and agree among themselves and each other to commit certain offenses
 2 against the United States, to wit: the manufacture and passing of counterfeit obligations
 3 of the United States, that is, Federal Reserve Notes, which they knew to be falsely made,
 4 forged, and counterfeited, in violation of 18 U.S.C. §§ 471 and 472, and in furtherance of
 5 this conspiracy did commit overt steps, as set forth in this Indictment, all in violation of
 6 18 U.S.C. § 371.

7 **MANNER AND MEANS**

8 The Defendants ANTHONY DANIEL RAMIL, GERALD W. TARMAN,
 9 TERESA LOUISE ALLEN, and BRIENNA ELAINE ALLEN, did use printers, laptop
 10 computers, paper trimmers, and Federal Reserve Note back plates, to manufacture
 11 counterfeit Federal Reserve Notes in \$20 denominations, bearing the serial numbers:
 12 IJ76840885A, IG79572673C, IB35993511B, JA76941548A, IF05286193A,
 13 JB85311121C, IF79356791H, ID06588228D, IA57580177A, and JL69678393C, and did
 14 later pass and attempt to^{PASS} these counterfeit Federal Reserve Notes in order to achieve the
 15 object of the conspiracy, which was to acquire products in exchange for the counterfeit
 16 currency and genuine currency as change once the counterfeit currency was passed.

17 **OVERT ACTS**

18 In furtherance of the Conspiracy, as charged in Count 1, and to achieve the objects
 19 thereof, the Defendants, ANTHONY DANIEL RAMIL, GERALD W. TARMAN,
 20 TERESA LOUISE ALLEN, AND BRIENNA ELAINE ALLEN, did commit the
 21 following overt acts:

22 1. On or about May 18, 2013, within the Eastern District of Washington,
 23 Defendant ANTHONY D. RAMIL did, with the intent to defraud, pass a counterfeit \$20
 24 Federal Reserve Note, bearing serial number IJ76840885A, which ANTHONY D.
 25 RAMIL knew to be counterfeit, at the Rosauers Supermarket located at 2610 E. 29th
 26 Ave., Spokane, Washington.

27 2. On or about June 7, 2013, within the Eastern District of Washington,
 28 Defendants GERALD W. TARMAN, TERESA LOUISE ALLEN, and BRIENNA

ELAINE ALLEN did, with the intent to defraud, pass four (4) counterfeit \$20 Federal Reserve Notes, bearing serial number IG79572673C, which GERALD W. TARMAN, TERESA LOUISE ALLEN, and BRIENNA ELAINE ALLEN knew to be counterfeit, at the Walgreens located at 1708 W. Northwest Blvd., Spokane, Washington.

3. On or about June 8, 2013, within the Eastern District of Washington, Defendants ANTHONY DANIEL RAMIL, GERALD W. TARMAN, TERESA LOUISE ALLEN and BRIENNA ELAINE ALLEN did, with the intent to defraud, pass two (2) counterfeit \$20 Federal Reserve Notes, bearing serial number IB35993511B, which ANTHONY DANIEL RAMIL, GERALD W. TARMAN, TERESA LOUISE ALLEN, and BRIENNA ELAINE ALLEN, knew to be counterfeit, at Ace Hardware located at 1330 N. Argonne Road, Spokane Valley, Washington.

4. On or about July 3, 2013, within the Eastern District of Washington, Defendant ANTHONY DANIEL RAMIL did, with the intent to defraud, pass four (4) counterfeit \$20 Federal Reserve Notes, bearing serial number IA57580177A, which ANTHONY D. RAMIL knew to be counterfeit, to Travis Martin in exchange for a HP printer, in Spokane, Washington.

COUNT 2

On or about May 18, 2013, within the Eastern District of Washington, Defendant ANTHONY DANIEL RAMIL did, with the intent to defraud, pass a falsely made, forged and counterfeit \$20 Federal Reserve Note, bearing serial number IJ76840885A, which ANTHONY DANIEL RAMIL knew to be falsely made, forged, and counterfeit, at the Rosauers Supermarket located at 2610 E. 29th Ave., Spokane, Washington, in violation of 18 U.S.C. §§ 472 and 2.

COUNT 3

On or about June 7, 2013, within the Eastern District of Washington, Defendants GERALD W. TARMAN, TERESA LOUISE ALLEN, and BRIENNA ELAINE ALLEN did, with the intent to defraud, pass four (4) falsely made, forged, and counterfeit \$20 Federal Reserve Notes, bearing serial number IG79572673C, which GERALD W.

1 TARMAN, TERESA LOUISE ALLEN, and BRIENNA ELAINE ALLEN knew to be
 2 falsely made, forged, and counterfeit, at the Walgreens located at 1708 W. Northwest
 3 Blvd., Spokane, Washington, , in violation of 18 U.S.C. §§ 472 and 2.

4

5 **COUNT 4**

6 On or about June 8, 2013, within the Eastern District of Washington, Defendants
 7 ANTHONY DANIEL RAMIL, GERALD W. TARMAN, TERESA LOUISE ALLEN
 8 and BRIENNA ELAINE ALLEN did, with the intent to defraud, pass two (2) falsely
 9 made, forged, and counterfeit \$20 Federal Reserve Notes, bearing serial number
 10 IB35993511B, which ANTHONY DANIEL RAMIL, GERALD W. TARMAN,
 11 TERESA LOUISE ALLEN, and BRIENNA ELAINE ALLEN, knew to be falsely made,
 12 forged, and counterfeit, at Ace Hardware located at 1330 N. Argonne Road, Spokane
 13 Valley, Washington, in violation of 18 U.S.C. §§ 472 and 2.

14

15 **COUNT 5**

16 On or about July 3, 2013, within the Eastern District of Washington, Defendant
 17 ANTHONY DANIEL RAMIL did, with the intent to defraud, pass four (4) falsely made,
 18 forged, and counterfeit \$20 Federal Reserve Notes, bearing serial number IA57580177A,
 19 which ANTHONY DANIEL RAMIL knew to be falsely made, forged, and counterfeit, to
 20 Travis Martin in exchange for a HP printer, in Spokane, Washington, in violation of 18
 21 U.S.C. §§ 472 and 2.

22

23 **COUNT 6**

24 That on an exact date unknown, but no later than on or about May 21, 2013, and
 25 continuing until on or about July 12, 2013, in the Eastern District of Washington, the
 26 Defendants, ANTHONY DANIEL RAMIL, GERALD W. TARMAN, TERESA
 27 LOUISE ALLEN, and BRIENNA ELAINE ALLEN, and others both known and
 28 unknown to the Grand Jury, with the intent to defraud, did knowingly falsely make and
 manufacture counterfeit obligations of the United States, specifically counterfeit Federal
 Reserve Notes in \$20 denominations bearing the serial numbers: IJ76840885A,

1 IG79572673C, IB35993511B, JA76941548A, IF05286193A, JB85311121C,
2 IF79356791H, ID06588228D, IA57580177A, and JL69678393C, in violation of 18
3 U.S.C. §§ 471 and 2.

4 **NOTICE OF FORFEITURE ALLEGATIONS**

5 The allegations contained in Counts 1-6 of the Indictment are hereby re-alleged
6 and incorporated herein by this reference for the purpose of alleging forfeitures pursuant
7 to 18 U.S.C. § 982(a)(2).

8 Upon conviction of any of the offenses in Counts 1-6, in violation of 18 U.S.C.
9 §§ 371, 471, and 472, Defendants ANTHONY DANIEL RAMIL, GERALD W.
10 TARMAN, TERESA LOUISE ALLEN, and BRIENNA ELAINE ALLEN shall forfeit to
11 the United States, pursuant to 18 U.S.C. § 982(a)(2), any property, real or personal,
12 which constitutes or is derived from proceeds traceable to the offenses. The property to
13 be forfeited includes, but is not limited to, the following: a money judgment, vehicles,
14 and real property.

15 If any of the property described above, as a result of any act or omission of any of
16 the Defendant:

- 17 (a) cannot be located upon the exercise of due diligence;
18 (b) has been transferred or sold to, or deposited with, a third party;
19 (c) has been placed beyond the jurisdiction of the court;
20 (d) has been substantially diminished in value; or
21 (e) has been commingled with other property which cannot be divided without
22 difficulty;

23 ////

24 ////

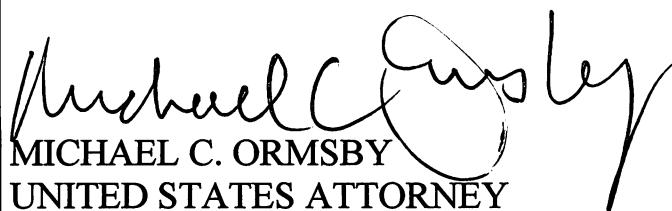
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1 the United States shall be entitled to forfeiture of substitute property pursuant to 21
2 U.S.C. § 853(p), as incorporated by 18 U.S.C. 982(b)(1) and 28 U.S.C. § 2461(c). All
3 pursuant to 18 U.S.C. § 981(a)(2)(A) and 28 U.S.C. § 2461(c).

4 Dated this 21nd day of January 2015.

5
6 A TRUE BILL
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10 
11 MICHAEL C. ORMSBY
12 UNITED STATES ATTORNEY

13 Aine Ahmed
14 Assistant United States Attorney